



# Modern Slavery Statement

**FY25**

**FLEETWOOD**  
AUSTRALIA

Modern Slavery Statement for the year ended 30 June 2025. Fleetwood Limited (ASX:FWD) ABN 69 009 205 261.

Our Modern Slavery Statement ('Statement') is published in accordance with the *Modern Slavery Act 2018* (Cth) (the 'Act').

This Statement is made in respect of the reporting period 1 July 2024 to 30 June 2025 and sets out the actions taken by Fleetwood Australia to assess and mitigate modern slavery risks in its business and supply chains.

## Consultation

This Statement has been prepared in consultation with controlled entities (including the Reporting Entities (as defined in the Act) input and endorsement from Fleetwood Australia's Sustainability Committee, responsible management and members of procurement, risk and compliance, finance, legal, company secretariat and human resources functions.

The process included:

- (1) providing an overview of the reporting requirements under the Act to relevant members and corporate officers involved in the review and endorsement of the Statement;
- (2) detailing information regarding the actions to be taken to address these requirements; and
- (3) seeking feedback with respect to modern slavery matters.

# Modern Slavery Act Reporting criteria

Criteria	Page
Identify the reporting entity.	3
Describe the structure, business, operations and supply chains of the reporting entity and any entity that the reporting entity owns or controls.	5
Describe the consultation process with any entity that the reporting entity owns or controls.	1
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entity that the reporting entity owns or controls.	7
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence, policies, training and remediation processes.	8
Describe how the reporting entity assesses the effectiveness of actions taken.	12
Contains details of the approval by the Board of Fleetwood Australia.	13
Any other information that the reporting entity considers relevant.	12

# Reporting entity

This Statement is prepared for the Reporting Entities Fleetwood Limited (ACN 009 205 261), Fleetwood WA & SA Pty Ltd (ACN 009 306 950) and Fleetwood VIC & QLD Pty Ltd (ACN 114 678 349).

This Statement however generally describes the activities of Fleetwood Limited (ACN 009 205 261) and its controlled entities as listed below:

- Fleetwood WA & SA Pty Ltd (ACN 009 306 950)
- Fleetwood VIC & QLD Pty Ltd (ACN 114 678 349)
- Fleetwood NSW Pty Ltd (ACN 127 380 330)
- Glyde Digital Pty Ltd (ACN 050 031 993)
- Camec Pty Ltd (ACN 004 846 584)
- Camec (NZ) Limited (NZBN 9429 038 762 321)
- Northern RV Pty Ltd (ACN 008 763 193)
- Recreational Vehicle Concepts Pty Ltd (ACN 008 682 513)

(referred to collectively in this Statement as Fleetwood Australia).

Fleetwood Limited is governed by its Board of Directors, consisting of the Chief Executive Officer and Managing Director, and five (5) Non- Executive Directors across a broad skills matrix.



# Vision, purpose and values

**Guided by our values, we deliver innovative solutions that help people and businesses thrive.**

Our actions to address modern slavery are guided by our values, particularly integrity, which promotes speaking up about things that matter.

With a vision to be the leader in reimagining sustainable spaces, Fleetwood Australia is committed to strengthening its modern slavery governance framework.

## Vision

To be the Leader in Reimagining Sustainable Spaces

## Purpose

To create innovative spaces so people can thrive

## Values

Zero harm, Collaboration, Integrity, Accountability, Innovation



# Structure and operations

Across three core areas, we deliver smarter spaces with expertise, vision and lasting impact.

Fleetwood Australia was established in 1964 and operates three businesses:

- Building Solutions
- Community Solutions
- Recreational Vehicle (RV) Solutions

At Fleetwood, we're shaping what's next for Australia, delivering innovative, sustainable and leading solutions in the modular building construction, community village and RV sectors.

Backed by over 60 years of industry expertise, we're proud to help create the homes, accommodation and road-travel experiences of tomorrow.

## **FLEETWOOD** BUILDING SOLUTIONS

We believe in building smarter spaces for tomorrow. Fleetwood Building Solutions is the only Australian-owned and operated national modular building company, delivering innovative, sustainable spaces across Australia.

Fleetwood Building Solutions is at the forefront of modular construction in Australia, designing and delivering sustainable, high-quality buildings across diverse sectors, from government amenities to education, mining and housing accommodation.

## **FLEETWOOD** COMMUNITY SOLUTIONS

We believe in building smarter community spaces and in supporting the growth of communities across every corner of Australia. Fleetwood Community Solutions is at the forefront of innovation, delivering modular accommodation and village solutions.

We partner with clients to build, own and operate high-quality mining camps, community housing, flagship transient workforce accommodation, lifestyle villages and defence accommodation.

## **FLEETWOOD** RV SOLUTIONS

We believe in creating smarter solutions for Australia's travellers and Fleetwood RV Solutions brings together two trusted brands, Camec and Northern RV to deliver comfort, safety and innovation for every adventure, from the open road to remote campsites.

As a leading manufacturer and supplier of Recreational Vehicle (RV) camping parts, accessories and servicing, we support RV owners, manufacturers and the wider industry across Australia and New Zealand. We are proud to be the original equipment manufacturer (OEM) for leading caravan building companies.

For further information about Fleetwood Australia, please refer to our website: <https://www.fleetwood.com.au>

# Supply chain

Fleetwood Australia's supply chain consists of goods and services from a broad range of industries that support each of its markets in Building Solutions, Community Solutions and RV Solutions.

Key categories within Fleetwood Australia's supply chain include, but are not limited to:

- construction materials and consumables;
- recreational vehicle parts and accessories;
- plant and equipment hire;
- safety equipment;
- personal protective equipment/work wear;
- workforce labour hire;
- subcontract construction services;
- technology and hardware;
- transport, travel and accommodation; and
- general facilities management (including cleaning and other office services).



# Assessing risks of Modern Slavery

Fleetwood Australia is committed to reducing the risk of modern slavery and uses a risk management approach incorporating culture, people, processes and systems to identify and address modern slavery risks within our operations and supply chain.

Fleetwood Australia considers the risk of exposure to modern slavery practices in our supply chain is greater than in our own operations, particularly in our construction and manufacturing supply chains.

- In FY25, Fleetwood Australia engaged with approximately 426 first tier suppliers for Fleetwood Australia's Building Solutions business, 34 first tier suppliers for Community Solutions and 192 first tier suppliers for RV Solutions; and
- Approximately 99% of Building Solutions' and Community Solutions' procurement spend was from within Australia.

During the reporting period, we identified the following areas of modern slavery risk within our operations:

- 20% of RV Solutions' procurement spend was from within Australia with a significant portion located overseas. We acknowledge some imports in Fleetwood Australia's RV Solutions business are from jurisdictions that present a higher risk of modern slavery according to the Global Modern Slavery Index<sup>1</sup>. Given RV Solutions is a much smaller business compared to the Building Solutions and Community Solutions businesses, the statistics illustrate that Fleetwood Australia engages largely with suppliers that are local and Australian based;
- Fleetwood Australia recognises that some of its first tier and second tier suppliers source goods from overseas or extend their supply chain of services by subcontracting. This creates complex supply chains and reduces Fleetwood Australia's ability to trace and monitor supply chains; and
- Whilst we have improved awareness of modern slavery risks amongst Fleetwood Australia's Executives and key work areas during the reporting period, additional training will be beneficial to increase awareness and identification of modern slavery risks amongst all levels, as part of inductions and our employee training program.

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<sup>1</sup> <https://www.globalslaveryindex.org/>



# Addressing risks of Modern Slavery

Fleetwood Australia is committed to addressing and reducing the risk of modern slavery in its operations.

During the reporting period Fleetwood Australia progressed its FY25 initiatives, as follows:

- Established a Sustainability Committee committed to reviewing the effectiveness of Fleetwood Australia's modern slavery controls and providing a forum for regular engagement and feedback;
- Implemented a Modern Slavery Policy to address modern slavery risks in our operations and supply chain (a copy of which can be located on Fleetwood Australia's website <https://www.fleetwood.com.au/investor-centre/corporate-governance>);
- RV Solutions undertook an analysis and audit of its new overseas suppliers engaged by Camec in FY25 during the reporting period, through VTrust Inspection Services. No evidence of modern slavery was identified and Camec continues to actively monitor its international imports and exports;
- Reduced the volume of first tier suppliers in Building Solutions from 635 to 426 essential suppliers, to mitigate the potential of modern slavery risks arising;
- Reviewed and consolidated Supplier questionnaires across Building Solutions, Community Solutions and RV Solutions, with the focus of structuring a consistent approach to measure modern slavery risks amongst our suppliers;
- Contracting frameworks established in FY25 reflected market standard provisions to address compliance within Australia's modern slavery regime, with a right for Fleetwood Australia to terminate the contract, in the event of non-compliance; and
- Increased awareness and ongoing discussion of modern slavery compliance and risk identification amongst Fleetwood Australia's Executives and key work areas, including procurement and human resources.

Fleetwood Australia continues to maintain the below measures to assess and mitigate modern slavery risks in its supply chain, including:

### **Supplier due diligence**

Mandatory tender qualitative assessment: Suppliers and subcontractors, who engage with Fleetwood Australia on a regular and/or significant basis, are required to participate in a pre-qualification process, providing details of its modern slavery risk assessment policy and strategies in its supply chain. If any supplier or subcontractor fails to demonstrate appropriate modern slavery risk management processes or are unwilling to share the requested information in this regard, Fleetwood Australia can cease engagement of that supplier or subcontractor; and

Monitoring supplier spend: Fleetwood Australia monitors and maintains thresholds for supplier spending as Fleetwood Australia recognises that not all suppliers may have undertaken the mandatory tender qualitative assessment (and therefore, associated modern slavery risk assessment). As a result of this dashboard, Fleetwood Australia has extended its mandatory tender qualitative assessment to additional suppliers.

### **Original equipment manufacturers**

Fleetwood Australia actively contracts with Original Equipment Manufacturers (OEMs) to reduce the number of tiers in its supply chain, and in turn mitigate modern slavery risk.

### **International imports**

Fleetwood Australia undertakes international site/factory inspections to engage with international suppliers and better understand their supply chain. Fleetwood Australia is not aware of any modern slavery breaches by our international suppliers, but we are committed to actively monitor this risk as part of our ongoing modern slavery risk management.

### **Completion of questionnaires**

Fleetwood Australia completes modern slavery questionnaires for its customers or as a requirement of a tender process. These questionnaires allow Fleetwood Australia to consider points of focus in the industries in which Fleetwood Australia operates and consider the effectiveness of our internal policies and processes. Input is provided by various key procurement, risk and compliance, legal, company secretariat and human resources functions.

During the reporting period, Fleetwood Australia did not receive any reported concerns of modern slavery practices from our responses to these questionnaires (or otherwise), nor did it identify any instances of modern slavery in its operations or amongst our suppliers.

### **Contract review**

Most of Fleetwood Australia's precedent standard form contracts and national supply agreements include market standard provisions to address compliance with Australia's modern slavery regime.

Specifically, Fleetwood Australia's contracts include warranties that counterparties comply with modern slavery laws and that they are not engaged in, or will engage in, any conduct that would comprise a modern slavery offence. The warranties also provide a right of termination if parties engage in or allow conduct which would comprise a modern slavery offence.

### **Fleetwood Australia's employment framework**

Fleetwood Australia supports a fair and safe workplace by implementing employment conditions and processes in line with, or which go beyond, the Fair Work Act 2009 (Cth) and market standard employment practices. We conduct periodic employee engagement surveys to better understand and respond to the needs of our workforce.

Fleetwood Australia also has employment policies, processes, procedures and guidelines that reflect current legislation and best practice to safeguard the interests of employees, potential employees and others working for us. Training is designed by our Human Resources teams and includes compulsory staff induction and ongoing training on key internal policies and procedures.

### **Risk management**

The Fleetwood Australia Board supports in its oversight of modern slavery risk by its committees including the Sustainability Committee, Risk Committee and Remunerations & Nominations Committee.

Each committee plays an important role in monitoring compliance with policies and practices to prevent modern slavery within our direct operations and to address modern slavery risks in our supply chain. The committees are chaired by independent non-executive directors and meet at least twice a year.

The Sustainability Committee considers and advises on people centric matters relating to non-financial risk, including modern slavery.

We encourage all stakeholders to report concerns or feedback regarding how we manage human rights in our operations and supply chain.

## Policies

In addition to the [Modern Slavery Policy](#), Fleetwood Australia continues to maintain various policies and associated procedures to improve and support our commitment to addressing modern slavery in our operations and supply chain, including:

- [Fleetwood Australia's Code of Conduct](#), which requires all employees and those we work with to maintain a work environment where human rights are valued. If any human rights violations are reported to or identified by Fleetwood Australia, they will be responded to appropriately; and
- [Fleetwood Australia's Speak Up Policy](#), which encourages all employees and external stakeholders to report any improper conduct including if they become aware of any modern slavery connected to Fleetwood Australia or its supply chain. All complaints are investigated in a fair and objective manner, including the involvement of external parties where appropriate. Fleetwood Australia employees or stakeholders who wish to report improper conduct can do so by making a report to Fleetwood Australia's Whistleblower Officers or via Fleetwood Australia's external and independent whistleblowing service provider.





# Effectiveness of actions taken

Fleetwood Australia is committed to reducing modern slavery risks associated with RV Solutions' overseas procurement. The audit by VTrust Inspection Service of all new overseas suppliers engaged by Camec in FY25, has provided valuable insight and assurance regarding its new international suppliers' compliance with Australia's modern slavery standards.

The establishment of Fleetwood Australia's Supplier Due Diligence strategies, as detailed above, continues to be a positive and effective mechanism to standardise our supplier on-boarding process and to gain insight into our suppliers' compliance with modern slavery requirements. Through this process, Fleetwood Australia continues to be assured that many of our first-tier suppliers are similarly taking steps to assess and address modern slavery risks within its supply chain.

The incorporation of reciprocal modern slavery contractual obligations and warranties continues to be well received by contracting partners, subcontractors and suppliers, within and outside of Australia, and has further demonstrated Fleetwood Australia's commitment to comply with modern slavery laws.

The growing awareness amongst Fleetwood Australia regarding Modern Slavery compliance and risk mitigation has facilitated more informed discussions regarding subcontractor engagements and collaboration between project teams and our procurement team.

Fleetwood Australia will continue to report on the outcome of these measures and any other measures taken to improve the overall effectiveness of Fleetwood Australia's actions in connection with modern slavery in future Modern Slavery Statements.





# Continuous improvement and future commitments

Whilst Fleetwood Australia considers we have low exposure to modern slavery in our direct operations, we recognise the importance of continued efforts to improve the management of modern slavery risk in our supply chain.

We are committed to ongoing improvement of our modern slavery management activities and aim to undertake the following key actions in the next 12 months:

## **Supplier questionnaire**

Implement a standard questionnaire across Building Solutions, Community Solutions and RV Solutions to assist consistent assessment of modern slavery risks and compliance by suppliers (including the investigation of second and further tiers throughout their supply chain) and to develop mitigation actions with suppliers to reduce their modern slavery risk (where necessary).

## **Supplier risk assessment matrix**

This matrix assists Fleetwood Australia to map its suppliers and assess risk across its businesses. The matrix is to be further developed to reflect Fleetwood Australia's understanding of the current risks of modern slavery practices in its operations and supply chains.

## **Risk management**

Continue modern slavery considerations as part of Fleetwood Australia's Risk Management framework and incorporate ongoing modern slavery discussions into relevant areas of Fleetwood Australia's organisation, with updates reported to the Sustainability Committee where relevant.

## **Contract suites**

Continued focus on our contracting frameworks through ensuring all pre-existing and any new contracting frameworks developed in FY26 incorporate modern slavery obligations.

## **RV Solutions international suppliers**

Undertake audits of Camec's key overseas suppliers and actively monitor international imports/exports and modern slavery compliance.

## **Training and development**

Review and update Fleetwood Australia's modern slavery training module and implement training for relevant personnel.

# Approval

This Modern Slavery Statement was approved by the Board of Directors of Fleetwood Limited on 29 July 2025.



John Klepec  
Chair of the Board  
Fleetwood Limited



Bruce Nicholson  
Managing Director & CEO  
Fleetwood Limited





**Fleetwood Limited**

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